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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IDAN U. EDRY, an individual, on behalf of
himself and others similarly situated;

Plaintiff,
vs.

HOMETOWN EQUITY MORTGAGE, LLC, a
Missouri limited-liability company, d/b/a/
THELENDER,
Defendant.

Case No.: 2:22-cv-00804-MMD-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(Second Request)

Pursuant to LR II 26-4 and LR IA 6-1, Plaintiff, IDAN U. EDRY (“Plaintiff”), and Defendant, HOMETOWN EQUITY MORTGAGE, LLC d/b/a/ THELENDER (“Defendant”) (collectively, the “Parties”), by and through their respective undersigned counsel, hereby stipulate to and request an order extending all remaining discovery deadlines in this matter by 120 days.

This is the Parties’ second request to extend all pending discovery deadlines in this matter. The parties maintain that good cause exists for this request. Since the first extension (ECF No. 45), the parties entered into a Confidentiality and Protective Order (ECF No. 46) and have been diligently engaged in discovery. Plaintiff recently took multiple depositions of Defendant’s

representatives, including Defendant's Director of Wholesale, and Defendant's 30(b)(6) witness. Following fruitful meet and confers between counsel, Defendant is currently in the process of supplementing certain responses to Plaintiff's Second Set of Requests for Production of Documents; it is anticipated that the production will require thorough analysis and review by counsel and the parties' respective expert(s), thereby necessitating additional time to prepare expert reports and for Plaintiff to file a prospective motion for class certification. In addition, the parties are working together to notice additional fact witness depositions in Las Vegas in October, including the deposition of Plaintiff Edry. Finally, the current deadlines inadvertently run up against end-of-the year holidays when counsel and the parties have pre-planned family and travel obligations.

In addition to the foregoing, the Parties anticipate further necessary discovery, including deposition(s) of designated expert(s).

The Parties therefore propose the following discovery schedule:

A. Discovery Cut-Off Date: Discovery shall close on **March 29, 2024**.

B. Expert Disclosures:

1. Initial Expert Disclosures: The deadline to make initial expert disclosures shall be **January 30, 2024**.

2. Rebuttal Expert Disclosures: The deadline to make rebuttal expert disclosures shall be **February 29, 2024**.

C. Class Certification Motion: Plaintiff shall file a class certification motion on or before **February 22, 2024**.

D. Dispositive Motions: The deadline for filing dispositive motions shall be **May 10, 2024**.

E. Pre-Trial Order:

The deadline for filing a pretrial order shall be **June 11, 2024**. If dispositive motions are filed or Plaintiff's class certification motion is pending, the deadline to file the joint pretrial order shall be suspended until 30 days after the court issues decisions on any dispositive motion, class certification motion or further court order.

F. Extension Of Scheduled Deadlines:

LR II 26-4 governs the modification or extension of any deadline set by this amended Discovery Plan and Scheduling Order. Any motion or stipulation to extend any deadline set forth in the Discovery Plan and Scheduling Order must satisfy the requirements of LR IA 6-1, be supported by a showing of good cause for the extension, and be received by the Court no later than twenty-one (21) days before the expiration of the subject deadline.

DATED this 31st day of August, 2023.

**WOLF, RIFKIN, SHAPIRO,
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ITS IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

9-5-2023

DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of August, 2023, a true and correct copy of **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (SECOND REQUEST)** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/Melissa Shield
Melissa Shield, an Employee of
WOLF, RIFKIN, SHAPIRO, SCHULMAN &
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